

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
09 MAY 26 A9 24

UNITED STATES OF AMERICA,

JON W. SANFILIPPO  
CLERK

Plaintiff,

v.

09 CR-138  
Case No. \_\_\_\_\_  
[T. 26 U.S.C. § 7206(1) and  
T. 31 U.S.C. § 5324(a).]

MICHAEL FEKER  
formerly known as Mohammad Daghighfekr,

Defendant.

INFORMATION

COUNT ONE  
(26 U.S.C. § 7206(1))

**THE UNITED STATES ATTORNEY CHARGES:**

1. On or about October 17, 2002, in the State and Eastern District of Wisconsin,

**MICHAEL FEKER,**  
formerly known as Mohammad Daghighfekr,

who was then married and a resident of Milwaukee, Wisconsin, did willfully make and subscribe a joint United States Individual Income Tax Return (Form 1040, hereinafter "return") for the calendar year 2001, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which return Feker did not believe to be true and correct as to every material matter in that Feker indicated on the return that he and his wife had adjusted gross income (AGI) for 2001 of negative \$69,118; taxable income during 2001 of \$0; and that their total federal tax due to

the IRS for 2001 was \$0, whereas, in fact, and as Feker well knew, he and his wife had adjusted gross income and taxable income substantially greater than reported on his 2001 tax return and that their total federal tax due to the IRS for 2001 was substantially greater than reported by Feker on the return.

All in violation of Title 26, United States Code, Section 7206(1).

**COUNT TWO**  
(31 U.S.C. § 5324(a))

**THE UNITED STATES ATTORNEY FURTHER CHARGES:**

2. During the period from approximately December 2002 though December 2003, in Milwaukee, in the State and Eastern District of Wisconsin,

**MICHAEL FEKER,**  
formerly known as Mohammad Daghighfekr,


for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, structured, and assisted in structuring, the deposit of approximately \$37,088 in United States currency into accounts he maintained at banks in the Milwaukee area by making cash deposits to his accounts in amounts less than \$10,000.

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d) and Title 31, Code of Federal Regulations, Section 103.11.

**FORFEITURE NOTICE**

3. Upon conviction of the offense in violation of Title 31, United States Code, Section 5324(a)(3), set forth in Count Two, the defendant shall forfeit to the United States, pursuant to Title 31, United States Code, Section 5317(c), all property, real or personal, involved in the offense and any property traceable thereto, including, but not limited to, \$37,088, which is the sum of money involved, directly or indirectly, in the offense.

May 26, 2009  
Date

  
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MICHELLE L. JACOBS  
Acting United States Attorney